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Ex Parte

February 21, 2003

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 02-237, Verizon Telephone Companies Section 63.71 Application to Discontinue Expanded Interconnection Service Through Physical Collocation

Dear Ms. Dortch:

This is in response to the staff's question about the potential savings a collocator could achieve by converting to the state tariffs if the collocator is currently ordering the least amount of power necessary to achieve redundancy under the federal tariffs. In the staff's hypothetical question, a collocator with equipment drawing 40 amps and needing redundancy on two feeds could order 30 amps load on each feed, which would be fused to 45 amps (1.5 times load as provided under the federal tariffs). However, in this example, if one of the feeds failed, the 45 amp fuse on the remaining feed would not be sufficient to handle equipment with a 40 amp load. The customer would need at least a 50 amp fuse on each feed to handle a 40 amp load. This would produce a total of 100 fused amps that would be billed under the federal tariff. In contrast, under the state tariffs, the customer would be billed for only 40 load amps, or a 60 percent reduction in billed amps if the customer converted to the state tariffs (60 divided by 100).

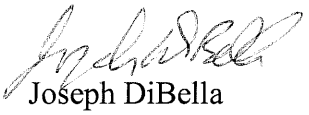
Attached, as requested, is a revised analysis of the difference between the federal and state tariff charges, assuming that current collocators reduced their billed amps by 60 percent if they converted to the state tariffs. We should point out that this

hypothetical is not realistic, as Verizon's surveys show that collocators, on average, can reduce the billed amount of power on their federal arrangements by two thirds while still maintaining adequate fused capacity to support the equipment they have deployed in their federal arrangements, and that they can easily achieve the savings that Verizon estimated in its reply comments.

This issue was also addressed in Conversent's February 14, 2003 *ex parte* letter, where Conversent demonstrated once again that it does not understand the savings it could achieve if Verizon converted from billing based on fused amps under the federal tariff to billing based on load amps under the state tariffs. In its January 29, 2003 *ex parte* letter, Conversent stated it had revised its power requirements under the federal tariffs to reduce its billable amps from 60 fused amps per feed to 30 fused amps per feed. In the February 14 letter, Conversent stated that its equipment ordinarily draws 40 load amps per collocation arrangement, which includes two fuse panels, with both an "A" feed and a "B" feed on each fuse panel. In other words, Conversent claims that it places 10 load amps on each of the four feeds. However, Conversent states that it actually orders 20 amps load on each feed for such arrangements because it understands that Verizon requires this practice. What Conversent appears to mean by this is that in order to obtain a 30 amp fuse on each feed to support a 10 amp load, it must specify a load of 20 amps because the federal tariffs only allow fusing at 1.5 times load. However, this "clarification" simply proves Verizon's point. For such an arrangement, Verizon would bill Conversent for only 10 load amps under the state tariffs rather than 30 fuse amps that it currently bills under the federal tariffs.[1] Therefore, Conversent would be billed for only one third of the amps under the state tariffs that it is currently billed under the federal tariffs.

This demonstrates that, even after Conversent reduced its power requirements under the federal tariffs, it could reduce the billable amps by another two-thirds by converting to the state tariffs. The attachment to Verizon's Reply Comments, which assumes a two-thirds reduction in billable amps by converting from the federal to state tariffs, accurately represents the potential savings to Conversent and other collocators if the Commission approved Verizon's section 214 application to discontinue providing DC power to collocation arrangements in its federal tariffs.

Sincerely,



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Attachment
cc: Jennifer McKee
Jeffrey Dygert

[1] Under the state tariffs, Conversent could arrange for fusing at 2.5 times load. Therefore, for a 10 amp load on each feed, Conversent could obtain a 25 amp fuse, which would be sufficient to carry the load on both feeds (20 total load amps) if one of the feeds failed.

ATTACHMENT REDACTED

CONTAINS CONFIDENTIAL PROPRIETARY INFORMATION SUBJECT TO PROTECTIVE ORDER